

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
Debtor

: CHAPTER 13
: No. 16-15095AMC

Markiea D. Ward

ANSWER TO MOTION FOR RELIEF AND CERTIFICATE OF SERVICE

The Debtor has a good track record over the last two years of making payments and it is requested that the debtor be given a chance to get caught up.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 09/23/18

The Chapter 13 Trustee and Mario Hanyon, Esq. Are being served with a copy of the Answer by electronic mail.

/s/ David M. Offen
David M. Offen
Attorney for Debtor